Q. Then on the right side, that right block is not parsed at all; is that right?

A. That is correct.

Q. Did you make any attempt to parse the information in the right block?

A. No, I did not.

Q. Why not?

A. Time. I was told to do what I could in the short amount of time that was allotted for it.

Q. Going back to the three blocks on the left, are those broken into data fields?

A. Yes, that is correct.

Q. I guess you're interpreting fields then to include those lines. Each line would be a field?

A. I'm not sure if I understand the question.

Q. For example, let's look at the upper left block. It looks to me like we've got a line for the name Dizon, Alex and Callie. Is that one of the fields that you populated?

A. Yes. I populated that with the information that was within the HTML for the customer service record.

Q. Are you familiar with the fields that must be populated on an EDI order?

A. I am not familiar with exactly which fields were populated, no.

Q. Are you generally familiar -- for example, let me ask you this.

A. I don't --

Q. Go ahead.

A. I know that there is certain information that needs to go on there. I know that there are things like the listed name, the billing name, the delivery name and address for the directories, the type of service that you're requesting, things of that nature. But exactly how that information is presented in the order, I'm not familiar with that.

Q. And for example, just take the street address on an EDI order. Do you know if it requires fields for the street number, street name, street type such as road and street directionality?

A. I don't know that.

Q. Mr. Berman, do you know?

BY MR. BERMAN:

A. I don't know that either.

Q. Looking at that upper left block, it appears that the street address appears twice there, do you know why that would be?

BY MR. RUNNELS:

A. I believe the first listing is the directory listing. And the second listing is the actual street address that may be the opposite though. One is the actual listing, one is -- one is the directory listing. One is the actual street address.

Q. So you should always see two street addresses filling those two blocks or those two lines, excuse me?

A. Yes. For the CSRs which I tested the parsing on, there was a directory listing address as well as an actual address.

Q. Did Albion make any attempt to parse this data in these left-hand blocks to any finer level of granularity?

A. For purposes of this presentation, I determined that this was really all that was needed. I didn't -- I didn't break it down, no. I didn't even attempt to break it down any further than what you see here.

Q. Based on your experience in this

project, would you expect any difficulty in attempting to parse the data down into smaller pieces?

A. Yes.

Q. Why is that?

A. That is because the information that is entered in these fields, I believe is free form.

Q. What do you mean by free form?

A. In other words, well, say for example, the second box, the top left of the window that you see here is a drop-down list. So where you see Georgia dash Atlanta, a user would be required to pick one of those.

So it's either one of those, or it's nothing. Whereas the one above it is a telephone number which can be entered by hand. So the user has the ability to put in whatever he or she wants. It's my guess that it's the same thing with these fields, as you see them here.

Q. These fields referring to the four blocks?

A. Referring to the blocks, yes. Say for example, the directory listing. That's how you want it listed; right? And that's not necessarily -- I mean you can have -- as far as I

know, you can have your listing in a directory appear just about any way you want it. So my guess is that you wouldn't want to limit someone to entering that a particular way.

Q. Why is that?

A. Well, because if you required someone to put in a city, for example, and they don't want a city, then you're not giving them the service that they want. So in other words, these lines there's no set format to these lines. So you would really just be guessing as to where to parse.

Q. And so for example, you might run into difficulty as a programmer trying to deal with a street name that had two words in it?

A. Correct.

Q. You might have trouble with whether street or road was abbreviated or not?

A. Correct.

Q. The street might or might not have a directionality associated with it.

A. Correct.

Q. City name might have more than one word in it?

A. Correct.

Q. Zip code might have five or it might have 10 characters?

A. I don't know that.

Q. But previous ones, those are all problems that would make it difficult, perhaps impossible to parse this information at a finer level of granularity?

A. Yes.

Q. Let's look for a moment at the right block. Do you see most of the way down the page, there's three way calling, an entry for that? Do you see that?

A. Yes.

Q. And then it appears under that line there's a telephone number. And then below that, there's another line of data. Starting with ZSER. Do you see that line?

A. Yes.

Q. Do you know what data that is being communicated there?

A. No.

Q. Do you know a what field identifiers are, or FIDS as they're sometimes called?

A. I've heard the term. I'm not sure that I could define it.

Q. I gather it was not part of -- strike that. I gather you didn't attempt to interpret all the information that appears in this screen to the right or this block to the right?

A. No. I'm not familiar with the business enough to do that.

Q. Did you ever request BellSouth to provide a CSR record layout?

A. I asked if there was one. And I was told that there was not.

Q. Who did you ask?

A. I believe that I asked Raymond Betts.

Q. Did he tell you anything else other than there was not one?

A. Regarding that request, no.

Q. Right. I understand you talked to him about other things.

A. Right.

Q. But that was his only response when you asked whether there was a CSR record layout?

A. Right, there was not.

Q. What is a record layout?

A. I assume that a record layout would be saying in this line or in this space within a record, you can expect this type of information to

appear.

Q. It would, I suppose for example. Tell you that in that unbroken string of string of characters that we've been talking about, the first 20 deal with the person's name?

A. It could be something along that line. It could also be, in the case of the other HTTP, there aren't necessarily definite lengths to fields that are delimited by certain tags.

In other words, if you see this certain tag, string of characters -- say question mark, pound sign, whatever -- you know that what comes after that is a certain type of value.

Q. And was it those tags that enabled you to parse the information into the blocks shown on this screen on page 25?

A. They were not HTML tags. As you stated, the HTML tags within the document are at the beginning of this long string of text and at the end. But within the long string of text, there are other things that I use. Say for example, billing name was prefaced by BN, if I saw BN, I knew the next thing was the billing name.

Q. So you were to some extent able to break the code?

A. Yes.

Q. But not completely?

A. As completely as I felt was necessary.

Q. As completely as necessary to fill these lines of data shown on the screen?

A. Yes.

Q. Well, I believe you testified before that you couldn't say for sure that the application you developed would parse CSRs even at this level of granularity in any case; is that right?

A. That is correct.

Q. Mr. Runnels, were you involved at all in the part of the project where information was taken from the pre-ordering stage and then automatically populated into an EDI order?

A. Well, there are two parts to that. One is -- there are two parts to our application from a presentation standpoint, in the ordering. One is the pre-order information. That is where the actual CGI integration takes place. Telephone numbers are gathered, addresses validated, etc.

When you go through the firm order part, what we have termed in here the generate LSR, certain information is used -- certain

information from the pre-order part of the application is used to automatically populate fields within the firm order part of the application.

So in other words, the address that you validated in the pre-order is the address you're going to use in the firm order. So we'll carry that over. The address that you use for service is most likely going to be the address that you use as a listing for delivery information, for billing. These fields are pre populated.

The user has the ability to change that. It's only when all of the information from the pre-order and firm order that are required is entered that that information that has been stored as part of this big object that we call order is actually converted into the EDI order. And that is a separate process.

Q. And based on that experience that you had with EDI ordering, is the EDI order broken into fields such as the number for the street address and street name and so forth?

A. I don't know the actual fields that are on the EDI order.

Q. Is that because you don't remember

or --

A. I was not responsible for that part of the application.

Q. Who was?

A. That was Muthu, M-u-t-h-u.

Q. Mr. Berman, is that true for you as well?

BY MR. BERMAN:

A. That's true. I've seen the file that's been created, but I can't answer to that detail.

BY MR. RUNNELS:

A. I've seen the file as well, but I again can't answer to that detail.

Q. Can you tell me, Mr. Runnels, whether you would expect to be able to populate the EDI order using data parsed to the level shown on page 25 of your report?

A. I don't know.

Q. When a LENS calls for CSR information, it obtains it from the CRIS database; is that right?

A. I don't know that. I don't know -- basically, I make a call. And I get back information. I'm not sure what all sort of back-end processing that BellSouth goes on to give

me that information.

Q. Based on your knowledge and experience, you expect that the BellSouth database for CSR information, whatever it's called, would have to be broken down by fields to the specified numbers of characters?

A. I'm sorry, could you repeat that?

Q. Yes. I'm trying to -- the question is, based on your knowledge and experience, would the BellSouth database with this CSR information have to be broken down by fields with specified numbers of characters?

MR. ALEXANDER: Let me object, because the foundation of the question says based on his knowledge and experience. This witness has testified he did the CSR parsing that you've been crossing about for the last 10 minutes in three days.

As long as we're clear that that knowledge and experience is three days, then go ahead with your question.

BY MR. O'ROARK:

Q. Yes, I'm really getting at your knowledge as a computer programmer. You've dealt with databases a lot, I would assume.

A. I do not know the database SCHEMA for the CSR.

Q. Did you ever ask for the SCHEMA?

A. I asked Raymond if there was a way to get the information at a more granular level. He told me that as a LENS developer, he and his coworkers would have liked to have been able to present that in more granular fashion but that what they got from the database was in the format similar to what you see presented here.

And he was not aware of how it was stored in the database or exactly -- either he was not aware or he did not communicate to me how that information got from the database to LENS.

Q. Have you ever seen a database that didn't have fields broken down in specified numbers of characters?

A. Well, I'm not sure how to answer that question.

Q. Do they typically?

A. Well, again, I'm not sure how to answer that question. If you're asking should -- say for example -- the directory listing be broken down into 3822 as a separate column, Meadow as a separate column, Green as a separate whatever, I

don't know.

It would depend on the needs. Whether or not that should have a specified length is up to the database administrator to design. Some columns have specified lengths. Some columns have variable lengths.

BY MR. BERMAN:

A. Let me add to this. I've worked on many different accounts or projects for clients that do it different ways. For instance, one experience that I have is that they have broken it apart purely for reasons for postage. Okay. In other words, they can get better postal rates because this piece is broken out, the way they group, the mailing.

Versus other clients don't have the need or the requirement to break it down any further, okay. But if they do break it down, they don't tell you the length, okay, because it's an attribute in and of itself.

So when you receive it or go after it from a database, per se, like street number versus street name, that's it. You know that that's the two different components. Okay.

//

BY MR. RUNNELS:

A. I guess the point I'd like to make is that I don't know whether 3822 Meadow Green Court, N. W., is stored as one long -- it could be one column in a database. It could be multiple columns in the database. I don't know that.

Q. Okay. If I use the term field by field parsing to refer to parsing in a greater level of granularity that would, say, break street address down by number, name, type, and directionality, will you understand what I'm talking about?

A. Yes.

Q. Would you agree with me that the only way to parse CSR data accurately and consistently on a field by field basis would be to have direct access to the CRIS database or the BellSouth database?

A. No. I would not agree with that. There would be two ways, one of which if you had direct access to the database, obviously you wouldn't have to worry about the layout.

BY MR. BERMAN:

A. The database has to support that as well.

//

BY MR. RUNNELS:

A. Right.

Q. One at a time.

A. But if the CSR were presented in a format similar to the way a list of telephone numbers was presented, and it actually said, you know, first name this and last name that or whatever, that's another way to do it. There's probably a lot of other ways to do it. I don't know that it's necessary that you have to have access to the database.

Q. I want to make sure I understand the second way that you just described. I gather that would be to have some intermediary service, sort of like LENS or whatever LENS uses, that brings the data back in a more user-friendly format? Is that what you're describing?

A. Well, for example the billing name is prefaced by BN, so I know what comes after it is the billing name. The billing address is prefaced by BA. So I know that that string after it is the billing address. Someone could, I suppose, take it a step further and say BA-1 is the street number, BA-2 is the street name, BA-3 is the directional or whatever.

Q. And if you didn't have direct access to the database, then that sort of information somehow would have to be conveyed through whatever service goes and gets the information from the database; is that right?

A. Yes.

Q. Mr. Berman, you said you had something to add. And I didn't want to interrupt you, but I wanted to get you one at a time. Is there anything you had to add to that?

BY MR. BERMAN:

A. No.

Q. Mr. Berman, do you recall in late July receiving a telephone call from Mark Turner of MCI?

A. That's correct.

Q. I take it it was a fairly brief call?

A. Yes, sir.

Q. Mr. Turner asked you for the technical specifications for OPII; is that right?

A. That's correct.

Q. And what was your response to that?

A. My response -- Mr. Turner basically acted like there was another piece of documentation that Albion had on top of what we're

looking at here that's been entered, as well as there is a version of this that's purely a summary form. Those are the only two pieces of documentation that Albion had created for this project.

Q. Other than the actual software code; right?

A. Other than the software code.

Q. Did Mr. Turner ask to set up a call to discuss the work you had done on CSRs?

A. That's correct.

Q. And I gather that the date that he wanted to schedule the call was one on which you were not available?

A. I don't remember that. It was apparent that he wanted to talk at a detailed level about CSRs that Jack would have been much more capable of handling.

Q. So you had Mr. Runnels call Mr. Turner back?

A. I do not remember chronologically how that came into being. I called Jack and told him that there would be a gentleman that would be calling him. In fact, we talked to him a little bit about what this gentleman wanted to talk

about. And I guess they made the connection.

Q. Mr. Runnels, did you call Mr. Turner, or did Mr. Turner call you?

BY MR. RUNNELS:

A. I believe Mr. Turner called me.

Q. And I gather you had two telephone calls, that first one with Mr. Turner and then one the next day with Mr. Turner and a Mr. Mike Alden of MCI?

A. I do not recall the name of the developer that was involved in the conversation, but the first conversation was myself and Mr. Turner. And he set up the conference call the next day for himself, me and the developer.

Q. And when you say the developer, that's someone else within MCI?

A. Like I said, you provided the name.

Q. Right.

A. I'm not sure if that was the person's name or not. But I was told it was a developer with MCI.

Q. I'm just trying to make sure we're communicating.

A. Right.

Q. Was there anybody else on the call from

Albion?

A. No.

Q. To your knowledge, was anybody else on the call at all?

A. I don't know.

Q. Okay. Did Mr. Turner tell you that MCI had been trying to use the CGI to process CSR data and had been having trouble doing so?

A. I don't recall whether it was Mr. Turner or Mr. Alden that communicated that to me. But that fact was communicated.

Q. And let's just talk about the two -- strike that. Are you able to distinguish the two calls, or would it be easier for you just to talk about them collectively?

A. Well, the first call was essentially just to set up the second call. No technical -- there was no really no technical talk about the CSR during the first call.

Q. Well, during the calls, were you told by the MCI representatives that they were calling because they had heard that Albion had been able to use the CGI successfully for CSR data?

A. For parsing the CSR, yes.

Q. Did you say on the calls that in fact

Albion had had problems in parsing the data?

A. I said that we had -- that there were no technical specs for doing that, that it was something -- well, first of all, I made clear that I only spent a few days working on it. And I only tested it on a few numbers. So I couldn't guarantee that it would work in all circumstances and that there was no technical specification for the -- like a record layout or anything like that for CSR.

Q. When you say technical specification, you're using that synonymously with record layout?

A. No, not synonymously. Well, there was a technical specification for the CSR, in as much as there was one for the other information that was coming back via the CGI interface. In other words, the information that I used, if you look at a web page using a browser, like NetScape or Internet Explorer, you have the ability to view the source code behind the window.

And if you were to print off the source code for a CSR or address validation or something like that, that would be essentially the same thing that was in the CGI specifications. So in

other words, this is what you're going to get back. It may or may not -- depending on what you were talking about -- go into more detail about what each thing within the source code that you got was.

Q. What additional technical specifications would you need to parse CSRs in more detail?

A. Well, again, it depends on the format. If you wanted to use the HTML that was returned via the CGI interface, to do that, in my opinion, you would have to have -- well, basically, you need to have something that's unique for each thing that you want to parse out.

If you want -- and say for example billing address, if all you care about is the billing address, regardless of the individual pieces of that, the BA in front of that is sufficient. If you want to use the HTML that comes back to parse it down to the lower level, you would need to have some sort of identifier prior to the street number, for example, or the street name.

Q. And to do that, you would want specifications that would tell you what?

A. You know, that say for example, B-1 is street number, B-2 is street name.

Q. Is that similar to a data dictionary?

A. I don't know.

Q. Mr. Berman, do you know?

BY MR. BERMAN:

A. I don't know.

Q. Did you tell Mr. Turner that there was a lot left out of the CGI specifications?

A. Yes.

Q. Other than what you described, can you tell us what kinds of things were left out?

BY MR. RUNNELS:

A. Well, specifically for the CSR, what was left out was what each of the lines meant. Essentially, it said here's what you get back. In other cases, as I had stated earlier, there were either typos or perhaps certain things should have been sent along with a certain string, a certain call to the CGI server to get back information.

Some things were missing. That's why I had to call Raymond or Carol to find that information out. There were a couple cases, like say for address validation that for whatever reason, zip code was left out as one of the things

that you need to send in in the request string. Different things like that.

Q. Did you tell Mr. Turner and Mr. Alden that you could parse CSR data into large blocks but not smaller fields needed for a database?

A. If you wanted to store in a database down to the level of street name, street number etc., you could not do that, given the way that it returned, no.

Q. And in its current form, it would be impossible to parse CSRs at that level?

A. Yes.

Q. Did you tell Mr. Turner that BellSouth had attempted to parse CSRs at that level, and it was unable to do so?

A. That refers to what I had said earlier that the LENS developers -- and I can't speak for BellSouth as a whole, but the LENS developers wanted it potentially at a more granular level, but that what they got was essentially, you know, what I got. That's the level they got it at. So that's how they presented it.

Q. Did you say anything to the effect that to parse to that field by field level, you would need direct access to BellSouth's database, not

via HTML?

A. Given if you were to try to use -- I guess what I was trying to say was that given the way it's presented in HTML, you cannot do it, because there is nothing that delineates a number versus a street name versus a street abbreviation or whatever within a particular line.

If the HTML if the presentation within the HTML was not to change, then my suggestion would be -- and obviously, I'm sure everybody would love to have direct access to a database, but for security reasons not everybody is going to -- you wouldn't necessarily want to allow that to happen.

(A discussion was had off the record.)

Q. One follow-up. One of you mentioned that, I think -- and correct me if I'm wrong -- that there were a few bugs that needed to be worked out after April 30th or problems that needed to be resolved. I can't remember how it was phrased. First of all, is that correct?

A. Yes.

BY MR. BERMAN:

A. Yes.

MR. ALEXANDER: Are you referring to